

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MARVIN PEARLSTEIN, Individually And On	:	<b>ECF CASE</b>
Behalf of All Others Similarly Situated,	:	
	:	No. 13 Civ. 7060 (CM) (KHP)
Plaintiff,	:	(Consolidated)
	:	
-against-	:	Oral Argument Requested
	:	
BLACKBERRY LIMITED (formerly known as	:	
RESEARCH IN MOTION LIMITED),	:	
THORSTEN HEINS, BRIAN BIDULKA, and	:	
STEVE ZIPPERSTEIN,	:	
	:	
Defendants.	:	
-----	X	

**DEFENDANTS' NOTICE OF MOTION *IN LIMINE*  
NO. 16 TO EXCLUDE EVIDENCE OR ARGUMENT REGARDING THE DRAFT  
APPLIED VALUE POWERPOINT**

MORRISON & FOERSTER LLP

Dan Marmalefsky (admitted *pro hac vice*)  
707 Wilshire Boulevard  
Los Angeles, California 90017  
(213) 892-5200

Jamie A. Levitt  
James J. Beha II  
Christina L. Golden Ademola  
250 West 55th Street  
New York, New York 10019  
(212) 468-8000

Jordan Eth (admitted *pro hac vice*)  
Christin J. Hill (admitted *pro hac vice*)  
425 Market Street  
San Francisco, California 94105  
(415) 268-7000

Erik J. Olson (admitted *pro hac vice*)  
755 Page Mill Road  
Palo Alto, California 94304  
(650) 813-5600

*Attorneys for Defendants*

PLEASE TAKE NOTICE that defendants BlackBerry Limited, Thorsten Heins, Brian Bidulka, and Steve Zipperstein (“Defendants”) submit this motion *in limine* No. 16 to exclude evidence or argument regarding the draft Applied Value presentation. This motion is based on this Notice of Motion and Motion, the supporting memorandum of law, Declaration of Christina L. Golden Ademola and the exhibits attached thereto, and any other written and oral argument that may be presented to the Court. For the reasons set forth in the supporting memorandum of law, the Court should grant Defendants’ motion *in limine* No. 16 and exclude evidence or argument regarding the draft Applied Value presentation.

Dated: March 7, 2022  
New York, New York

/s/ Christina L. Golden Ademola

MORRISON & FOERSTER LLP

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*Attorneys for Defendants*